

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION**

**Case No. 7:16-cv-30**

BONNIE PELTIER, as Guardian	)
of A.P., a minor child;	)
	)
ERIKA BOOTH, as Guardian	)
of I.B., a minor child; and	)
	)
PATRICIA BROWN, as Guardian	)
of K.B., a minor child;	)
	)
Plaintiffs,	)
	)
v.	)
	)
CHARTER DAY SCHOOL, INC.; ROBERT P.	)
SPENCER; CHAD ADAMS; SUZANNE WEST;	)
COLLEEN COMBS; TED BODENSCHATZ; and	)
MELISSA GOTT in their capacities as	)
members of the Board of Trustees of Charter Day	)
School, Inc.; and THE ROGER BACON	)
ACADEMY, INC.;	)
	)
Defendants.	)
	)

**PLAINTIFFS' MOTION  
FOR APPROPRIATE RELIEF**

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Bonnie Peltier, as Guardian of A.P., Erika Booth, as Guardian of I.B., and Patricia Brown, as Guardian of K.B. ("Plaintiffs"), by and through their counsel, bring this Motion for Appropriate Relief. For the reasons and under the authorities stated in the accompanying Memorandum in Support, and based upon the facts recited in the attorney declaration concurrently filed, Plaintiffs seek an order (a) striking the expert report in its entirety, (b) declaring the stipulation void, (c) imposing sanctions on Defendants' counsel for their deceptive and unethical behavior in the form of attorneys' fees and costs in connection with filing and

briefing this motion and the opposed motion for a Judicial Conference dated January 17, 2017, and (d) awarding such other relief as this Court deems just and proper.

RESPECTFULLY SUBMITTED, this the 25th day of January, 2017.

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 25, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Lenor Marquis Segal  
*Attorneys for Plaintiffs*